

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

LULA WILLIAMS, <i>et al.</i>,)	
)	
Plaintiffs,)	
v.)	Civil Action No. 3:17-cv-461 (REP)
)	
BIG PICTURE LOANS, LLC, <i>et al.</i>,)	
)	
Defendants.)	
)	

**PLAINTIFFS' MOTION TO COMPEL DOCUMENTS
WITHHELD ON THE BASIS OF ATTORNEY-CLIENT PRIVILEGE**

For the reasons explained in the Memorandum in Support filed contemporaneously herewith, Plaintiffs, by counsel, pursuant to Rule 37 of the Federal Rules of Civil Procedure and the telephone conference held by the Court on October 16, 2017, move for an order compelling production of all documents identified on Defendant Big Picture Loans, LLC's ("Big Picture Loans") privilege logs dated October 2, 2017, October 10, 2017, and October 13, 2017.

Respectfully submitted,
PLAINTIFFS

/s/ Kristi C. Kelly
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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October, 2017, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

/s/ Kristi C. Kelly

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